

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

GW Acquisition Co., LLC,

Plaintiff,

v.

Pageland Limited Liability Company, et al.

Defendants.

Civil Action No. _____

DECLARATION OF MARK WESTHOFF

I, Mark Westhoff, declare:

1. I make this declaration of my own personal knowledge, in support of Plaintiff GW Acquisition Co., LLC's, ("GWA") Motion to Seal and Memorandum in Support. If called upon to testify to the matters stated herein, I could and would do so competently.

2. I am GWA's VP, Corporate Real Estate. I have been with GWA's parent and/or related companies since 2009.

3. As VP, Corporate Real Estate, I am familiar with GWA's business practices and plans as it relates to the purchase and sale of real property. I am also familiar with the negotiations between Defendants Pageland Limited Liability Company and Barbara Brower (collectively "Sellers") as it relates to the Purchase and Sale Agreements ("Purchase Agreements").

4. GWA spent considerable time and effort negotiating the terms of the Purchase Agreements with the Sellers.

5. The Purchase Agreements govern the purchase by GWA and sale by Sellers and other owners of certain parcels of land in Prince William County.

6. The details of GWA's purchase and subsequent development of the parcels, if publicly disclosed, would result in a competitive disadvantage and negate the considerable time,

expense and effort that GWA has incurred to purchase and develop the property at issue here, as well as numerous other neighboring parcels.

7. GWA takes care not to disclose its practices to other competitors, as it would squander the competitive advantages that GWA derives from the careful analysis and business strategy it performs.

8. Thus, the Parties included confidentiality provisions in the Purchase Agreements, which specifically prohibit either GWA or the Sellers from making the contents of the Purchase Agreements public.

9. GWA has not made the sensitive information in these documents public as it is competitively sensitive.

10. This confidential information is valuable to GWA and it would be valuable to a competitor or potential competitor.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 8th day of March, 2022, in Kansas City, MO.

DocuSigned by:
/s/ 
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Mark Westhoff
VP, Corporate Real Estate
GW Acquisition, Co., LLC